

UNITED STATE DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Re. ETHAN MURPHY, et al. Plaintiffs,

-against-

PHILIPPE LAJAUNIE, et al. Defendants.

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13-cv-06503 (RJS) (SN)

Dear Judge Netburn,

Being Pro Se and not having the resources and means to hire a lawyer, I have no other choice but to respectfully address the Court directly.

Plaintiffs, through their attorneys Kirshenbaum and Goldman, have filed new documents in this Court, on or about July 11, 2017. Due to being out of town, there have been issues with getting the voluminous package that the files added to. I am not on the Court's Electronic Filing system. However on Friday July 21, 2017, upon my request, the lawyers' office forwarded all documents through email attachments. It is to be noted that until this filing, since I am Pro Se, Plaintiffs' attorneys had regularly emailed me all correspondence and Court documents, including Orders; but not this time. I have reminded them to do so, with no exception.

Due to the sheer size of the files, the lack of professional help, the complexity of the content, and the late reception of the documents, I would like to respectfully request an extension of time in order to review and reply properly.

Please consider that the initial Action from Plaintiffs was against two restaurants I owned. One closed in March 2016, and the other, 15 John Corp., has been in Chapter 11 Bankruptcy proceedings since August 25, 2016. Mr. Fox, the attorney for the Debtor, has filed a Letter (Exhibit A) with your Court and Judge Sullivan explaining that the Bankruptcy Court is waiting for an Order from Judge Sullivan, in the Southern District Court of New York, to approve the disclosure statement for a Chapter 11 Plan, on which the creditors, including all members of the class, would then vote. If this happens and the Plan is approved, it is very likely that this will end all matters, including this case. Further, as Mr. Fox explained, for purposes of the Plan, the Debtor has already conceded a claim of more than \$5,000,000 for the Class.

My resources have been exhausted, but rather than file for personal bankruptcy, or spend money I do not have on the inquest, I have tried to marshal all I can to contribute voluntarily to the Plan and work toward a regrowth of the 15 John restaurant in order to make the Plan succeed and benefit the class and other creditors. I join in the Debtor's request expressed in Mr. Fox's letter to have the inquest wait until we see the results of the Plan in the Bankruptcy Court.

Thank you,

Respectfully,

Cc: Maimon Kirshenbaum, Esq., Jeffrey Goldman, Esq.

Philippe Lajaunie

July 24, 2017